

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:20-cv-00954-UA-JLW

FARHAD AZIMA,)
)
Plaintiff,)
)
v.)
)
NICHOLAS DEL ROSSO and)
VITAL MANAGEMENT)
SERVICES, INC.,)
)
Defendants.)

**DECLARATION OF
BRANDON S. NEUMAN**

I, **Brandon S. Neuman**, do hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 the following:

1. I am a partner of the law firm Nelson Mullins Riley & Scarborough LLP, 301 Hillsborough St., Suite 1400, Raleigh, North Carolina 27603. I am a member in good standing of the Bars of the State of North Carolina, the State of California, and of this Court. Nelson Mullins Riley & Scarborough LLP is counsel to Defendants Nicholas Del Rosso and Vital Management Services, Inc., in this matter. I submit this declaration in connection with Defendant Nicholas Del Rosso's Reply in Support of Motion for Protective Order filed in the above-captioned matter.

2. I attach hereto as **Exhibit A** a true and correct copy of a February 15, 2023 letter sent by Defendants' counsel to Plaintiff Farhad Azima's

counsel regarding the improper use of restricted information across multiple pending matters.

3. I attach hereto as **Exhibit B** a true and correct copy of Plaintiff Farhad Azima's Rule 26(a)(1) Initial Disclosures, served on Defendants on December 21, 2022.

4. I attach hereto as **Exhibit C** a true and correct copies transcript excerpts from the deposition of Nicholas Del Rosso, which took place on February 13th and 14th, 2023.

5. I attach hereto as **Exhibit D** a true and correct copy of a February 13, 2023 letter that Defendants' counsel received from Allen & Overy LLP, a law firm representing RAK Development LLC and the Investment and Development Office of the Government of Ras Al Khaimah ("RAK").

6. I am over the age of eighteen years of age and competent to testify as to the matters set forth in this Declaration.

7. I declare under penalty of perjury that the foregoing is true and correct pursuant to 28 U.S.C. § 1746.

Executed on February 24, 2023 in Raleigh, North Carolina.

/s/ Brandon S. Neuman
Brandon S. Neuman

Respectfully submitted, this the 24th day of February, 2023.

**NELSON MULLINS RILEY &
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CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of February, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send electronic notification of filing to the following:

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